

By ECF

December 23, 2021

The Honorable James R. Cho
Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re:

Snead et al. v. Pratt Towers, Inc. et al. Civil Action No. 21-cv-00700 (NGG) (JRC)

Dear Judge Cho:

Our firm represents the Plaintiffs Joyce Snead and Georgianna Wilkins in the above-referenced civil action. I submit this letter to request an extension of the current deadline of December 28, 2021, by which the parties are to submit a joint status report to the Court in connection with filing the statement noting the death of Plaintiff Ms. Wilkins and serving same upon her successor or representative, and thereafter filing and serving the required motion to substitute Ms. Wilkins as a party pursuant to Fed. R. Civ. P. 25.

Pursuant to the Court's Individual Practices, namely section (C), I have conferred with counsel for the Defendants, the New York City Department of Housing Preservation and Development and Pratt Towers, Inc., and they both consent to the instant request for this extension of time.

Also, pursuant to section (C) of this Court's Individual Practices, no previous requests have been made to adjourn the December 28, 2021 deadline by which to file the joint status report. The instant request does not impact any other Court scheduled appearance or deadline.

The reason for this request for an extension of time is based on the following. Recently, our firm filed to commence an estate proceeding in Kings County Surrogate's Court to appoint a fiduciary to serve as the Administrator of Mr. Wilkins' estate. However, due to the current severe backlog being experienced in Kings County Surrogate's Court and the very recent disruption due to the suspension of one of the Surrogate's at said Court, we anticipate it will take quite some time before the Surrogate's Court is able to respond to the estate filings we have submitted and/or issue the required Letters to appoint a fiduciary to administer Ms. Wilkins estate.

Accordingly, we ask that the Court extend the current deadline for the parties to file a joint status report to February 28, 2022.

We thank the Court for its consideration and courtesies.

Yours truly,

Shelley Ann Quilty-Lake

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Cc: J. Paul (attorney for NYC Dept. of HPD); R. Valentino (attorney for Pratt Towers, Inc.)(By

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